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11 VENTURES LLC and BAMBUZA SMF
12 VENTURES LLC

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16

17 JOSE RAMIRO LOBATO
18 BARCENAS, individually and on behalf
19 of all others similarly situated,

20 Plaintiff,

21 v.

22 BAMBUZA OC VENTURES LLC, a
23 California limited liability company;
24 BAMBUZA SMF VENTURES LLC, a
25 California limited liability company; and
26 DOES 1 through 10, inclusive.
27 Defendants.
28

Case No.

**DECLARATION OF ERIK WARD
IN SUPPORT OF DEFENDANTS
BAMBUZA OC VENTURES LLC
AND BAMBUZA SMF VENTURES
LLC'S NOTICE OF REMOVAL
TO FEDERAL COURT**

Orange County Superior Court
Case No. 30-2024-01415928-CU-OE-CXC
(originally filed in County of Orange
Superior Court on July 30, 2024)

DECLARATION OF ERIK WARD

I, Erik Ward, hereby declare and state as follows:

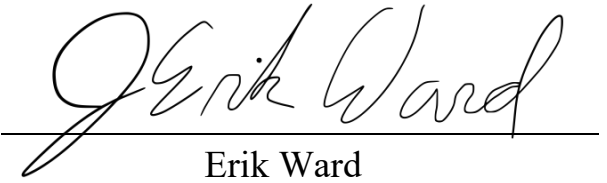
1. I am the Chief Development Officer for Defendants Bambuza OC Ventures LLC and Bambuza SMF Ventures LLC (“Defendants”). Except where otherwise indicated, all the information contained herein is based upon my personal knowledge and if called and sworn as a witness, I could and would competently testify thereto.

2. As Defendants’ Chief Development Officer, I am familiar with and knowledgeable as to Defendants’ business organization, including the structures of Bambuza OC Ventures LLC and Bambuza SMF Ventures LLC. The sole member of both Defendants Bambuza OC Ventures LLC and Bambuza SMF Ventures LLC is Bambuza South Waterfront LLC. The sole member of Bambuza South Waterfront LLC is Katherine Lam, President and CEO of Bambuza. Ms. Lam resides in Portland, Oregon. Bambuza’s principal place of business is Portland, Oregon.

3. I am familiar with and have reviewed personnel information, including wage rates, dates of hire and separation, and workweeks, for Plaintiff Jose Ramiro Lobato Barcenas and the other California, non-exempt employees Plaintiff purports to represent in the putative class.

4. Defendant Bambuza OC Ventures LLC began operations on March 29, 2021. Defendant Bambuza SMF Ventures LLC has never had any employees. Since March 29, 2021, through September 22, 2024, Defendant Bambuza Ventures LLC has employed approximately 132 non-exempt employees in California. These employees have worked approximately 6,277 workweeks, and their average hourly rate of pay was \$17.23 per hour. In the year prior to Plaintiff filing his complaint, Defendant Bambuza OC Ventures LLC employed approximately 98 non-exempt employees in California.

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2 Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury, under the
3 laws of the United States, that the foregoing is true and correct, and that this
4 declaration was executed on October 15, 2024, at Portland, Oregon.

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8 Erik Ward